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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
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7 Attorneys for Third-Party Defendant Cor Clearing

8
 9 UNITED STATES DISTRICT COURT
 10 DISTRICT OF NEVADA

11 CHINA ENERGY CORPORATION,)
 12)
 Plaintiff,)
 13)
 vs.)
 14)
 ALAN HILL, et al.,)
 15)
 Defendants,)
 16)
 ELENA SAMMONS AND MICHAEL)
 17 SAMMONS,)
 Third-Party Plaintiffs)
 18 vs.)
 19 CEDE & CO., THE DEPOSITORY TRUST)
 COMPANY, AND COR CLEARING)
 20)
 Third-Party)
 21 Defendants.)

3:13-CV-562-MMD-VPC

**STIPULATION AND ~~PROPOSED~~
 ORDER EXTENDING TIME TO
 RESPOND TO COMPLAINT
 (FIRST REQUEST)**

22
 23 Third-party Plaintiffs Elena Sammons and Michael Sammons, appearing in this matter *pro*
 24 *se*, and Third-party Defendant Cor Clearing ("Cor"), by and through its counsel, jointly submit the
 25 following Stipulation and [Proposed] Order Extending Cor's Time to Respond to the First Amended
 26 Third-party Complaint.

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 28 ///

1 1. Third-party Defendant Cor was served with the summons for the Third-party
2 Complaint on January 28, 2014. The deadline for Cor to answer, move, or otherwise respond to the
3 Third-party Complaint currently is February 18, 2014.

4 2. On January 29, 2014, Third-party Plaintiffs Elena and Michael Sammons filed a First
5 Amended Third-Party Complaint, which was served that same day via electronic mail and United
6 States Mail. Pursuant to Federal Rule of Civil Procedure 15(a)(3), Cor must respond to the First
7 Amended Third-Party Complaint, "within the time remaining to respond to the original pleading or
8 within 14 days after service of the amended pleading, whichever is later." Here, the deadline to
9 respond to the Third-party Complaint (February 18, 2014) is operative because it is the later date.
10

11 3. This is Cor's first request for an extension of time to respond. The reason for the
12 requested extension is that Cor just recently hired counsel and anticipates motion practice with
13 respect to the First-Amended Third-party Complaint. The short requested extension will allow Cor
14 the opportunity to fully respond to the First-Amended Third-party Complaint.
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16 The undersigned parties agree and stipulate as follows:

17 1. Cor's deadline to answer, move, or otherwise respond to the First Amended Third-
18 party Complaint shall be February 24, 2014.

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1 Respectfully submitted,

2 DATED: February 14, 2014.

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6 By: /s/ Bret F. Meich
Bret F. Meich

8 DATED: February 14, 2014.

MICHAEL SAMMONS, appearing *Pro Se*
15706 Seekers St
San Antonio, TX 78255
210 858 6199

12 By: /s/ Michael Sammons
Michael Sammons

13 DATED: February 14, 2014.

ELENA SAMMONS, appearing *Pro Se*
15706 Seekers St
San Antonio, TX 78255
210 858 6199

16 By: /s/ Elena Sammons
Elena Sammons

19 **[PROPOSED] ORDER**

20 IT IS SO ORDERED:

21 
UNITED STATES MAGISTRATE JUDGE

23 Dated this 18th day of February, 2014.

CERTIFICATE OF SERVICE

I, Zabett Buzzone, certify that on February 14, 2014, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the electronic mail notice list.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed February 14, 2014, at Reno, Nevada.

By: /s/ Zabett Buzzone
Zabett Buzzone